

**UNITED STATES DISTRICT COURT**  
for the  
**Southern District of Indiana**

United States of America	)	
v.	)	
	)	Case No.
Bobby Cyrus Linhart	)	1:24-mj-0272-KMB
	)	
	)	
	)	

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*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/17/2023 - 3/19/2024 in the county of Hancock in the  
Southern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2422(b)	-Coercion and Enticement of a Minor
18 U.S.C. § 2251(a) and (e)	-Sexual Exploitation of Minors
18 U.S.C. § 2252(a)(2)	-Distribution of Visual Depictions of a Minor
18 U.S.C. § 2252(a)(4)(B) and (b) (2)	-Possession of a Visual Depiction of a Minor Engaging in Sexually Explicit Conduct

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

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/s/ Trent Tonkovich

*Complainant's signature*

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SA Trent Tonkovich

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by  
telephone (reliable electronic means)

Date: March 20, 2024

City and state: Indianapolis, IN



**AFFIDAVIT IN SUPPORT OF AN  
APPLICATION FOR A COMPLAINT AFFIDAVIT AND AN ARREST  
WARRANT**

I, Special Agent Trent Tonkovich, being duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. **Affiant:** I am a Special Agent with the Department of Homeland Security, U.S. Homeland Security Investigations (“HSI”) and I am currently assigned to the Office of the Resident Agent in Charge, Indianapolis, Indiana. I have been employed as a Special Agent with HSI since January of 2020. Prior to being appointed as a Special Agent with HSI, I was a Border Patrol Agent with the United States Border Patrol for approximately 7 years assigned to the Falfurrias, Texas station. During my time as a Border Patrol Agent. I spent most of that time in narcotics and human smuggling interdiction. I have had training through the Federal Law Enforcement Training Center at Artesia, New Mexico for the U.S. Border Patrol and at Glynco, Georgia for HSI, and received a Bachelor of Science degree in Criminal Justice from Eastern Kentucky University. Since joining HSI, I have been involved in numerous investigations pertaining to the sexual exploitation of children. I received additional HSI training specific to child exploitation from September 2021. My training included interviewing, mobile messaging platforms, Crypto currency, dark web forums and message boards, cloud services, data analytics, and transnational sexual tourism. I also received training for cell phone forensics in June 2021.

2. **Requested Action:** This Affidavit is submitted in support of an application for a criminal complaint and arrest warrant for **BOBBY CYPRUS LINHART**, date of birth XX-XX-2001 (known, but redacted) for violations and attempted violations of:

- a. **Count 1:** Coercion and Enticement of Minor Victim 1 to Engage in Illegal Sexual Activity, in violation of 18 U.S.C. § 2422(b), between on or about July 17, 2023, and on or about July 20, 2023;
- b. **Count 2:** Sexual Exploitation of Minor Victim 2, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 18, 2023 and August 20, 2023;
- c. **Count 3:** Sexual Exploitation of Minor Victim 3, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 15, 2023 and July 20, 2023;
- d. **Count 4:** Distribution of Visual Depictions of Minor Victim 6 Engaged in Sexually Explicit Conduct to Minor Victim 3, in violation of Title 18, United States Code, Section 2252(a)(2), on or about July 20, 2023;
- e. **Count 5:** Sexual Exploitation of Minor Victim 4, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 15, 2023 and on or about July 22, 2023;
- f. **Count 6:** Sexual Exploitation of Minor Victim 6, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 18, 2023 and July 19, 2023; and

g. **Count 7:** Possession of a Visual Depiction of a Minor Engaging in Sexually Explicit Conduct in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2), on or about **March 19, 2024.**

3. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents and state and local law enforcement officers; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement officers; information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish that **LINHART** has violated or attempted to violate Title 18, United States Code, Sections 2251(a), 2252(a)(2), 2252(a)(4)(B), and 2422(b).

#### **STATUTORY AUTHORITY**

4. As noted above, this investigation concerns alleged violations of the following Subject Offenses:

a. 18 U.S.C. § 2251(a) and (e) prohibit any person from employing, using, persuading, inducing, enticing, or coercing any minor to engage in, or having a minor assist any other person to engage in, or transporting any minor

in or affecting interstate or foreign commerce with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, if such person knows or has reason to know that such visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed; or if that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer; or if such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed; or attempting or conspiring to do so.

b. 18 U.S.C. § 2422(b) prohibits any person from using the mail or any facility or means of interstate or foreign commerce to knowingly persuade, induce, entice, or coerce any individual who has not attained the age of 18 years to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or attempting to do so.

c. 18 U.S.C. § 2252(a)(2) and (b)(1) prohibit any person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any visual depiction using any means or facility of interstate or foreign commerce, or that has been mailed or shipped or transported in or affecting interstate or foreign commerce, or which contains materials which

have been mailed or so shipped or transported, by any means including by computer, or knowingly reproducing any visual depiction for distribution using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce or through the mails, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

d. 18 U.S.C. § 2252(a)(4)(B) and (b)(2) prohibit any person from knowingly possessing or accessing with the intent to view, or attempting or conspiring to possess or access with the intent to view, 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer, if the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction is of such conduct.

#### **BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE**

##### ***Initiation of the Investigation***

5. Based on my training and experience, and the facts as set forth below in this Affidavit, there is probable cause to believe that **BOBBY CYPRUS LINHART**, date of birth XX-XX-2001 (known to Affiant, but redacted), who is the resident located

at 1750 VILLAGE DR. WEST. Apt B., GREENFIELD, INDIANA 46140 (“SUBJECT PREMISES”), has committed violations of the following offenses:

- a. **Count 1:** Coercion and Enticement of Minor Victim 1 to Engage in Illegal Sexual Activity, in violation of 18 U.S.C. § 2422(b), between on or about July 17, 2023, and on or about July 20, 2023;
- b. **Count 2:** Sexual Exploitation of Minor Victim 2, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 18, 2023 and August 20, 2023;
- c. **Count 3:** Sexual Exploitation of Minor Victim 3, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 15, 2023 and July 20, 2023;
- d. **Count 4:** Distribution of Visual Depictions of Minor Victim 6 Engaged in Sexually Explicit Conduct to Minor Victim 3, in violation of Title 18, United States Code, Section 2252(a)(2), on or about July 20, 2023;
- e. **Count 5:** Sexual Exploitation of Minor Victim 4, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 15, 2023 and on or about July 22, 2023; and
- f. **Count 6:** Sexual Exploitation of Minor Victim 6, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 18, 2023 and July 19, 2023; and

g. **Count 7:** Possession of a Visual Depiction of a Minor Engaging in Sexually Explicit Conduct in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2), between on or about **March 19, 2024.**

6. On May 13, 2023, Fishers Police Department Detective Corey Miller, as part of the Hamilton County Metro Child Exploitation Task Force (HCMCETF), received information in the form of CyberTipline Report 162108097 from the National Center of Missing and Exploited Children (“NCMEC”). The reports were generated due to information submitted to NCMEC by Instagram (Meta Platforms, Inc.).

7. Also attached to CyberTipline Report were two additional and associated CyberTipline reports (159947317 and 162358312). These CyberTips were generated by Snapchat and Twitter (X Corp). Snapchat and Twitter had viewed the material associated with the reports prior to submitting them to NCMEC.

8. The Instagram Cybertip contained two uploaded files of suspected Child Sex Abuse Material and the following user information:<sup>1</sup>

**Phone:** +12106834344

**Date of Birth:** 07-17-2001

**Approximate Age:** 21

**Screen/User Name:** maps.syb

**ESP User ID:** 27052213501

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<sup>1</sup> Automated file categorization is based on NCMEC's review of uploaded files in this report OR a "Hash Match" of one or more uploaded files to visually similar files that were previously viewed and categorized by NCMEC at the time a PDF of this report was generated.

**IP Address:** 2600:1700:6ce0:3eb0:c5d2 (login 5/11/2023)

**Upload IP address:**

2600:1700:6ce0:3eb0:4d60:5ecd:91e2:be01

9. Detective Miller reviewed the information provided by all three providers.

10. Detective Miller then reviewed the Instagram CyberTip and found the two files of suspected child pornography had been uploaded and distributed by the user account maps.syb on or about May 10, 2023.

11. According to the report, the Instagram user maps.syb distributed the two files to the Instagram user reallysillyXXXX (known but redacted) (ESP User ID: 32792748061). Detective Miller reviewed the videos attached to the CyberTipline Report and verified they were in fact child pornographic material (defined as child pornography under Title 18, United States Code, Section 2256 and as outlined in Indiana IC Code 35-42-4-4). The videos were identical. Below is a description of the two files:

- A. File 1 – This is a 36-second-long video of a prepubescent female. The female is wearing a dark blue dress with flowers on it. The female licks her finger and then bends over in front of the camera, exposing her buttock and vagina. The child then digitally penetrates her anus. The child then licks her finger before ending the video. I would estimate this child to be between 7 and 9 years old.

B. File 2 – This is the same video file as File 1.

***Linhart's Use of Instagram Account maps.syb  
to Commit the Subject Offenses and Attempt to Do So***

12. On or about August 31, 2023, Detective Miller submitted a State of Indiana Search Warrant for the Instagram (Meta Platforms, Inc.) user account maps.syb (ESP User Id: 270552213501). Authority to search was authorized through the Hamilton County Superior Court by the Honorable Judge William Hughes, on August 1, 2023. On August 9, 2023, Instagram responded and provided the digital contents of the account. Instagram (Meta Platforms, Inc.) provided the following subscriber information for the account:

**Name:** Bobby

**Registration (account creation):** 01/02/2020 10:17:11

**Registration IP:** 71.143.82.237

**Phone Number:** 210-683-XXXX (known but redacted)

(verified)

**IP address associated with the account:** 208.70.47.39

2023-07-23 04:48:42 UTC

13. LINHART was later identified as being the user of the maps.syb account as set forth below.

14. Instagram is a facility of interstate commerce.

15. In summary, and as set forth below, Detective Miller reviewed the account and located additional images and videos of child pornographic material. While reviewing Direct Messages that LINHART, using maps.syb, had with other

Instagram users utilizing the Instagram platform, Detective Miller read that **LINHART** identified himself as a 17-, 21- and a 22-year-old male depending on the user with whom he was chatting.

16. Detective Miller further discovered that **LINHART** (the user maps.syb) was engaging in sexually explicit conversations with minor female children who identified themselves to be between the ages of 12 and 15 years old. In addition to having sexually explicit conversations, maps.syb was able to coerce the minor female children to produce and send nude photographs and videos of themselves as well as arranging to meet in person with the minor female children for sexual purposes.

17. On or about August 17, 2023, Detective Miller submitted three State of Indiana Subpoena's for each Instagram (Meta Platforms, Inc.) account as they relate to Minor Victims 3, 4 and 5.<sup>2</sup> Authority to subpoena each account was authorized through the Hamilton County Superior Court by the Honorable Judge Richard Campbell, on August 21, 2023. On August 24, 2023, Instagram responded providing the subscriber information of those accounts.

18. On September 26, 2023, Detective Miller submitted a State of Indiana Subpoena for the Instagram (Meta Platforms, Inc) account of Minor Victim 6.

19. On September 27, 2023, the subpoena was authorized through the Hamilton County Superior Court by the Honorable Judge Darren Murphy.

21. On September 29, 2023, Instagram responded providing the subscriber information contents of those accounts.

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<sup>2</sup> Minor Victims 1 and 2 are discussed below. Officers were able to identify them without subpoenas due to identification information contained within the chats themselves.

22. Using these Subpoenas, along with lead information, all of the minors have been identified and their names are known to law enforcement, but are hereinafter referred to as Minor Victims 1-6.

***LINHART's Coercion and Enticement of Minor Victim 1 and Attempted Exploitation of Minor Victim 1 (Count 1)***

23. Minor Victim 1 is a 13-year-old minor child from Rushville, IN, known to this affiant, and used the Instagram account BaileerXXXXXXX (known but redacted).

24. Between on or about July 17, 2023, and July 22, 2023, **LINHART**, using the Instagram account maps.syb, engaged in messaging and exchanging of images and videos with Minor Victim 1. Below are segments of the conversations that the user maps.syb had with Minor Victim 1 with the dates on which they occurred.

- a. Conversation between LINHART, using maps.syb, and Minor Victim 1 on 7/17/2023

**Minor Victim 1:** U look a lot older than 17 lol

**maps.syb:** u think so

**Minor Victim 1:** Ya

**maps.syb:** you

**maps.syb:** are

**maps.syb:** the prettiest most thicc 12yo i have ever met

**maps.syb:** YOU PRETTIER AND THICKER THAN THE GIRLS MY AGE

**maps.syb:** youre the prettiest 12yo on this planet

**maps.syb:** I WANNA BE INSIDE YOU

b. Conversation between LINHART, using maps.syb, and Minor Victim 1 on 7/19/2023

**Minor Victim 1:** I mean if u can we can hang out tomorrow night

**maps.syb:** OKAY DEAL

**maps.syb:** 100% this time

**maps.syb:** ur rushville righttt

**Minor Victim 1:** Ya

**maps.syb:** lemme see how far from here

**maps.syb:** 32 minutes

**maps.syb:** I'll prollt get there around 11-11:30ish

**maps.syb:** hey while im out tmrw, i can buy sum and bring it to u tmrw  
night after work

**maps.syb:** is that what you wanted?

**Minor Victim 1:** I jus need nic I feel like I'm suffocating without it

**maps.syb:** wt u gonna do for that nic tho

**Minor Victim 1:** what do u want me to do

**maps.syb:** i want you to throat my cock till tears form in your eyes

**maps.syb:** what about just get in my car and just sit there and let me use  
you how i want to

**Minor Victim 1:** Uhh idk

**maps.syb:** if needed i can make you stand and lean up against my car and I  
can bang your on the street

**Minor Victim 1:** Uhh ya no

**maps.syb:** i want you to hover over me squatting while you're naked n holding my cock w one of your hands in order to slip it into your pussy

**maps.syb:** what about just get in my car and just sit there and let me use you how i want to

**Minor Victim 1:** Uhh idk

**maps.syb:** if needed i can make you stand and lean up against my car and I can bang your on the street

**maps.syb:** suck it while i drive?

**Minor Victim 1:** maybe

**Minor Victim 1:** Are u gonna bring weed?

**maps.syb:** if you want me to

**Minor Victim 1:** Ok

**maps.syb:** i got your vape

**maps.syb:** r u excited for pp

**Minor Victim 1:** I mean idk if I wanna have sex tonight

**maps.syb:** I thought you said u wanted to

**maps.syb:** was it sum i did or said?

**maps.syb:** will u still suck it?

**Minor Victim 1:** Ya

c. Conversation between LINHART, using maps.syb, and Minor Victim 1 on 7/20/2023

**maps.syb:** 2023-07-20 01:45:41 UTC - where do i goo

**maps.syb:** 2023-07-20 01:45:45 UTC - i'll be done in about an hour

**Minor Victim 1:** 2023-07-20 01:47:08 UTC - 8\*\* w \*th st \*\*\*\*\* - (This has been redacted, the true address is known to this investigator).

**maps.syb:** 2023-07-20 01:54:59 UTC - ur 36m away

**maps.syb:** 2023-07-20 02:02:44 UTC - i'll be otw inna few

**maps.syb:** 2023-07-20 02:25:06 UTC - 30 nowww

**maps.syb:** 2023-07-20 02:30:44 UTC - are u sneaking out your window

**Minor Victim 1:** 2023-07-20 02:30:51 UTC - Ya

**maps.syb:** 2023-07-20 02:30:51 - 3 out

**Minor Victim 1:** 2023-07-20 02:53:04 UTC - Ok

**maps.syb:** 2023-07-20 04:29:25 UTC - i had sm funnnn :D

**Minor Victim 1:** 2023-07-20 04:30:37 UTC - Same

**maps.syb:** 2023-07-20 04:35:12 UTC - did u get pretty high or just a good perfect mellow high

**Minor Victim 1:** 2023-07-20 04:35:34 UTC - Perfect

**maps.syb:** 2023-07-20 04:40:01 UTC - good. im the same

**maps.syb:** 2023-07-20 04:46:07 UTC - MF I HAD SUCH A GOOS TIM

**maps.syb:** 2023-07-20 22:19:24 UTC - I love your eyes so much. They were literally radiating through the dark last night. They're so beautiful.

25. On or about July 21, 2023, Minor Victim 1 and **LINHART**, using maps.syb continued messaging. During that messaging, Minor Victim 1 distributed 2 images described below to **LINHART**, who was using maps.syb.

- a. File A is a JPG file, depicting a female holding up a purple shirt exposing both of her breast.
- b. File B is a JPG file, depicting a female with one breast exposed and the second breast being squeezed by a hand.

26. Neither image meets the definition of child pornography under federal law.

27. Minor Victim 1 and **LINHART** messaged further as follows:

**maps.syb:** i should've sucked on themmm

**maps.syb:** imma be honest I was jus really dehydrated from smoking n not drinkin water

**maps.syb:** imma be straight next time

28. Minor Victim 1 and **LINHART** messaged further on 7/22/2023:

**maps.syb:** can you hold me and play w my hair while i lay in between you againnn. that was nicee

**maps.syb:** did i eat your pussy well?

**Minor Victim 1:** Ya

**maps.syb:** Am I the best eater and fingers u had?

**Minor Victim 1:** I mean your up there

29. As set forth above, I believe that **LINHART** used the Internet, namely Instagram, to coerce and entice Minor Victim 1 to meet in person to engage in sexual activity, including oral to genital contact, on July 20, 2023, which is an offense under

Indiana Statute 35-42-4-3, Child Molest which his defied as sexual intercourse or sexual conduct with a child under 14 years old.

***LINHART Sexually Exploits Minor Victim 2 over Instagram (Count 2)***

30. Minor Victim 2 is a 13-year-old minor child known to this affiant from Plymouth, IN, who used the Instagram account JoslynnXXXXXXX (known but redacted).

31. Between on or about July 18, 2023, and August 22, 2023, **LINHART**, using the Instagram account maps.syb, engaged in messaging and exchanging of images and videos with Minor Victim 2. Below are segments of the conversations that the user maps.syb had with Minor Victim 2 with the dates on which they occurred.

- a. Conversation between LINHART, using maps.syb and Minor Victim 2 on 7/18/2023

**maps.syb:** "jus you yk that age is wrong

**Minor Victim 2 –** Ohhh how old r u?

**maps.syb:** do u like em older?

**Minor Victim 2:** Yeah

**maps.syb:** im 22

**maps.syb:** you still want me inside?

**maps.syb:** I'll pullout or nut in ur butt or mouth

**maps.syb:** deal?

**maps.syb:** or if I rly just want to bust deep inside your pussy, I can buy you a plan B love

b. Conversation between LINHART,using maps.syb and Minor Victim 2 on 7/19/2023

**maps.syb:** im gonna nut so deep inside ur ass 😭 🙏

**maps.syb:** cant wait to stretch ur holes open to my cock 💋 😊

**maps.syb:** UR GONNA BE MY LIL GF

**maps.syb:** THATS SO CUTEEE

**maps.syb:** the ages too tho 😍 🤘

**maps.syb:** I CAN BE LIKE

**maps.syb:** YO SECOND DADDY N RAISE YO CUTE ASS

**maps.syb::** then once u 18, 🏠 🐱 🔑 🕵️

**maps.syb:** thats technically grooming huh 😭 🚶

**maps.syb:** or does that just mean we both find grooming hot...

**maps.syb:** i love you so much 🤗 ☺

c. Conversation between LINHART,using maps.syb and Minor Victim 2 on 7/20/2023

**maps.syb:** aww its cute tho. my little girl excited for her first cock 😊

**maps.syb::** i wanna bury my face in ur booty 😫

**maps.syb:** i wish i could just wake up to getting my dick sucked 😢

**maps.syb:** i was jus thinking 🤗

**maps.syb:** bout how i cant wait

**maps.syb:** to feel ur pussy grip and suck my fingers as im fingering u

**maps.syb:** i just know you're so tight 😊 💋

**maps.syb:** i think ur pussy is rdy for its first cock 😍 😍

**maps.syb:** just goes to show how much of a slut you are at 13 😊

**maps.syb:** and then imma fuck your big gaped pussy 😊

**maps.syb:** and then put it inside ur tight asshole to finish 🤦

**maps.syb:** IM CUMMING IN YOUR ASS

**maps.syb:** imma drill u to your eyes roll back

- d. Conversation between LINHART, using maps.syb and Minor Victim 2 on 7/21/2023

**maps.syb:** im picking you up and fucking you

**maps.syb:** there's a good reason to be so tiny for daddy

**maps.syb:** you want daddy to put his weight on you while i pound your hole?

**maps.syb:** yk for being my sisters friend n being so young you sure are slutty

**maps.syb:** it'll feel better when you can feel me stretching your walls open with my hot hard cock

**maps.syb:** i wanna see u spread it so i can see the pussy hole 😩

- e. Conversation between LINHART, using maps.syb and Minor Victim 2 on 7/22/2023

**Minor Victim 2:** I DELETED ALL THE PICTURES I SENT YOU

**Minor Victim 2:** AND THE VIDEO OF ME TOUCHING MYSELF

**maps.syb:** i just got homeee

**Minor Victim 2:** IM SORRY

**maps.syb:** so u take it all back??

**Minor Victim 2:** Well I deleted the pics/ vids but besides that yes 😊

**maps.syb:** can u send em back :((

32. Following this messaging, Minor Victim 2 at **LINHART's** request produced and distributed a series of eight images depicting Minor Victim 2 in a bathroom shower.

33. The series of images depict Minor Victim 2 completely nude. Two of the eight images identified as image-187602447629251 (187602447629251), image-159027160477659 (159027160477659), depict close ups of Minor Victim 2's genitals.

34. I believe based on my training and experience that images described above constitute child pornographic material.

35. On or about July 22, 2023 at 08:38:17, Minor Victim 2, at **LINHART's** request, produced and distributed a 32-second-long video depicting Minor Victim 2 masturbating in the file entitled video-1812f757-d345-4120-9250-26eef0e02ca4-1689997091.mp4 (685788710035191).

36. I believe based on my training and experience this video constitutes child pornographic material.

37. Accordingly, I believe that on or about July 22, 2023, **LINHART** sexually exploited Minor Victim 2 in that he enticed her to produce a file entitled 1812f757-d345-4120-9250-26eef0e02ca4-1689997091.mp4 (685788710035191).

38. On or about July 23, 2023, **LINHART** continued to use Instagram to communicate with Minor Victim 2 as follows:

**maps.syb:** i jus like younger girls sm and wizz finally came in clutch 🤪

**maps.syb:** WITH THEM BEING CLOSE

**maps.syb:** AND ITS LIKE FINALLY A REALITY FOR ME NOW

**maps.syb:** something about the thought of a little girl like you being so stretched open her holes are literally gaped wide open for easy access turns me on sm

**maps.syb:** im destroying all 3 of ur holes. imma throat fuck u so hard and so much ur throat is gonna hurt

**maps.syb:** if you don't cry at some point on tuesday i messed up

**maps.syb:** i want you to cry and beg me to stop.

**maps.syb:** im going to completely strip you of everything you think you kno

**maps.syb:** i'm going to mentally break you down and build you back up into the perfect pocket pussy

**maps.syb:** you will be demoralized

**maps.syb:** during sex

**maps.syb:** no longer a human being with rights or a say in anything

**maps.syb:** you're literally just made to be used during sex

**maps.syb:** im going to make you do really dirty disgusting things

**maps.syb:** lil 13yo girl 😊

**Minor Victim 2:** I'm not gonna wanna stop

**maps.syb:** play w ur underage pussy then

39. At the request of maps.syb, Minor Victim 2 produces and sends a 59-second-long video to **LINHART**, who was using maps.syb. This video depicts Minor

Victim 2 masturbating, with the focus of the camera on her camera focused on her vagina while moving her fingers in and out of her vagina. In reviewing this video, based on my training and experience these images constitute child pornographic material.

40. On or about July 23, 2023, Minor Victim 2 and **LINHART** continued to communicate over Instagram as follows:

**maps.syb:** keep going!

**maps.syb:** i didnt get to see the hole 😞

41. At the request of maps.syb, Minor Victim 2 produces and sends a 19-second-long video of her vagina. The camera is focused in on her vagina. During the video Minor Victim 2 digitally penetrates her vagina and spreads her labia open.

42. In reviewing this video, based on my training and experience these images constitute child pornographic material.

43. Minor Victim 2 and **LINHART** continued messaging as follows:

**maps.syb:** dear goodness ur hole is super small

**maps.syb:** i want to eat ur pussy while my nose rubs against ur asshole

**maps.syb:** my name is bobby

**maps.syb:** DO A VIDEO

**maps.syb:** OF U TAKING THEM OFF

44. At the request of maps.syb, Minor Victim 2 produces and sends a 59-second-long video. This video begins with Minor Victim 2 standing in front her bed and the camera being slightly lower than the bed. Minor Victim 2 appears to start

the recording, while wearing underwear and a bra. Minor Victim 2 then turns around and faces the bed, where she then bends over onto the bed. Minor Victim 2 then stands back up and removes her underwear, exposing her anus and vagina. Minor Victim 2 then turns around and faces the camera, fully exposing her vagina. Minor Victim 2 then sits down on the bed and begins to masturbate in view of the camera. Minor Victim 2 then lays back on the bed where she continues to masturbate, exposing her vagina and anus.

45. In reviewing this video, based on my training and experience these images constitute child pornographic material.

46. Minor Victim 2 and **LINHART** continued to message as follows:

**maps.syb:** OH MY GOSH

**maps.syb:** YOU JUST TOOK THE BEST VIDEO I HAVE EVER GOTTEN

**maps.syb:** DO ANOTHER VIDEO LIKE THAT BUT W YOUR ASSHOLE  
INSTEAD???

**maps.syb:** CAN YOU DO THATTTT FOR ME BABYYY

**Minor Victim 2:** I GUESS

**maps.syb:** F ITS NOT TOO MUCH TO ASK I WOULD LOVE TO SEE  
YOUR FACE

**maps.syb:** u make me so horny

**maps.syb:** u fulfill all of my sexual desires

47. At the request of **LINHART** (maps.syb), Minor Victim 2 produces and sends a 35-second-long video. The video takes place in the same bedroom with the

camera facing the bed. Minor Victim 2 starts the recoding. Minor Victim 2 is fully nude, her breast and vagina are fully visible. Minor Victim 2 then turns around and bends over on the bed, exposing her anus and vagina. Minor Victim 2 then digitally manipulates her anus for approximately 24 seconds. Minor Victim 2 then ends the video by turning around and picking up the camera, exposing her face.

48. In reviewing this video, based on my training and experience these images constitute child pornographic material.

49. On or about August 9, 2023, Minor Victim 2 and **LINHART** continued to message over Instagram:

- a. Conversation between LINHART, using maps.syb and Minor Victim 2 on 8/9/2023

**Minor Victim 2:** I start school tmw remember?? I'm still a kid yk 😊😊

- b. Conversation between LINHART, using maps.syb and Minor Victim 2 on 8/20/2023

**maps.syb:** if i could legally i'd get u pregnant now to lock u down forever 😭

**maps.syb:** yeah but i cant exactly just bring u back home to my new apartment...

**maps.syb:** IM SURE I WOULD GET CAUGHT

**maps.syb:** THATS SCARY ASF OMG

**maps.syb:** N GO TO JAIL

- c. Conversation between maps.syb and Minor Victim 2 on 8/22/2023

**Minor Victim 2:** yes, taken advantage of, so since I'm easily influenced, you basically took advantage of me 😭😊

**maps.syb:** thats what grooming is

**Minor Victim 2:** wowwww

**maps.syb:** i mean ur your own person

**Minor Victim 2:** your going to jail 😢 🚧 🔑 🚧 ♀

50. As set forth above, this Agent believes on July 22, 2023, and July 23, 2023, maps.syb enticed Minor Victim 2 to produce and send child sex abuse material as it is defined under Title 18, United States Code, Section 2251(a) and 2256.

***LINHART Sexually Exploits Minor Victim 3 over Instagram (Count 3)***

51. Minor Victim 3 is a 14-year-old minor child from Liberty, KY, who used the Instagram account ReallysillyXXXX (known, but redacted). Minor Victim 3 was a subject of one of the Cybertips described above.

52. Between on or about July 15, 2023, and July 20, 2023, **LINHART**, using the Instagram account maps.syb, engaged in messaging and exchanging of images and videos with Minor Victim 3. Also, in these chat conversations are discussions that include Minor Victim 6, a 14-year-old minor child. In the chats that include Minor Victim 6, maps.syb is sending images and videos of Minor Victim 6 to Minor Victim 3. Below are segments of the conversations that the user maps.syb had with Minor Victim 3 with the dates on which they occurred.

- a. Conversation between LINHART, using maps.syb and Minor Victim 3 on 7/15/2023

**maps.syb:** i forgot how old u r

**maps.syb:** i say 15 turnin 16

**Minor Victim 3:** yes

**maps.syb:** when do u turn 16

**Minor Victim 3:** next year

**Minor Victim 3:** in april

**maps.syb:** 16 overrated 15 the best

**maps.syb:** i got this cute lil girl 15 mins away and she's obsessed asf

**Minor Victim 3:** how old is she

**maps.syb:** your age

**maps.syb:** imma own these girls

**maps.syb:** i need consistent little pussy

**maps.syb:** Next week is a big week

**Minor Victim 3:** why's that

**maps.syb:** to meet them

**maps.syb:** Ava and **Minor Victim 6**

**maps.syb:** **Minor Victim 6** is sweet and so innocent

**maps.syb:** imma rape her asshole

- b. Conversation between LINHART, using maps.syb and Minor Victim 3 on 7/16/2023

**maps.syb:** im so excited tbh

**maps.syb:** i found a 12yo

**Minor Victim 3:** she cute

[maps.syb then sends Minor Victim 3 two photographs of Minor Victim 1.]

**Minor Victim 3:** she's 12

**maps.syb:** yesss

**maps.syb:** that girl Minor Victim 6 wants me to take her v card on Monday

**maps.syb:** yessss

**maps.syb:** im super excited

**maps.syb:** Minor Victim 6 SAID YES TO ANAL

**maps.syb:** imma cum rn

**maps.syb:** SHE IS 4'11

**maps.syb:** SO SMALL AND TINY

**maps.syb:** that means smaller tighter holes !

**maps.syb:** i'd totally rape her friend but i dont wanna lose Minor Victim 6

and her friend is 13 too, Minor Victim 6 is 15

**maps.syb:** yeah dude wtf

this is everything i've ever wanted

**maps.syb:** im definitly creampieing them all

thats a lot of plan b

**maps.syb:** that 16yo said next time i can use her pussy

and her amazing throat ofc

**Minor Victim 3:** what 16yo

**maps.syb:** i didnt tell u?

**maps.syb:** a 16yo gave me insane throat for a vape

**Minor Victim 3:** FOR A VAPE

**maps.syb:** for like 50 minutes

**maps.syb:** yes a vape

**maps.syb:** too ez fr

**maps.syb:** now imma get to take this chick's virginity for \$25

**Minor Victim 3: FOR 25 DOLLARS**

**maps.syb:** i love these young dumb sluts

- c. Conversation between LINHART, using maps.syb and Minor Victim 3 on 7/17/2023

**maps.syb:** show me ur body bruhhh

**maps.syb:** ts not fair

**maps.syb:** that i havent seen u naked

**maps.syb:** JUST DO LIKE

**maps.syb:** A NAKED MIRROR SELFIE YK

**maps.syb:** TO GET THE FULL BODY

**Minor Victim 3:** what you want me to send it on telegram or here

**maps.syb:** you can send it on telegram or insta idm

**Minor Victim 3:** I'll probably just do telegram jus in case

53. No photographs were exchanged via Instagram direct messages between maps.syb and Minor Victim 3 during this date and time. However, on July 17, 2023, at 03:04:13 UTC, **LINHART**, using maps.syb, sent the following messages indicating that Minor Victim 3 may have sent a photograph through a different social media platform.

**maps.syb:** like i wanna see u play w ur pussio

but ik u cant so its good

**maps.syb:** buttt wanna see Minor Victim 6's nudesss

54. On or about July 7, 2023, at approximately 3:05:14 UTC, **LINHART**, using maps.syb, sent Minor Victim 3 six images depicting Minor Victim 6, which had been sent to **LINHART** by Minor Victim 6. Three images contain Minor Victim 6 wearing underwear, with the camera focused on her buttocks. Two images contain nude exposed breasts, with the camera focused on the breasts in each. One image contains Minor Victim 6's face, with the camera focused on her face only.

**maps.syb:** bro

**maps.syb:** i got this 15yo

**maps.syb:** or 14

**maps.syb:** i think 14

**maps.syb:** n look

55. **LINHART**, using maps.syb sent Minor Victim 3 an image of Minor Victim 6. Minor Victim 6 is wearing jeans and green underwear, which are pulled down near her knees. Minor Victim 6 is touching/covering her vagina with her hand and the image is focused on the Minor Victim 6's genital region. Maps.syb then goes on to talk about his attraction to minors and how he grooms them. These conversations are below.

**maps.syb:** these girls need me

**maps.syb:** this is all i have ever wanted dude.

**maps.syb:** as soon as i'm inside one i'll be happy

**maps.syb:** hopefully tomorrow

**maps.syb:** i groomed Minor Victim 6

**maps.syb:** for like the past week

**Minor Victim 3:** what

**maps.syb:** when we first met she said: im 15. we can't be together

**maps.syb:** and i just asked her how long she wanted to lose her card

**maps.syb:** she said ever since she met me

**maps.syb:** i groomed this lil girl

**maps.syb:** i get to have her tomorrow

**maps.syb:** im recording

**maps.syb:** and i'm showing you

**maps.syb:**

**maps.syb:** i'm making her my gf btwww. i'm going to have more than one

btww and they'll all knowy

**maps.syb:** i met the cutest 12yo

**Minor Victim 3:** what

**maps.syb:** she has bracessss

**maps.syb:** I BAGGED A BADDIE BTW

**Minor Victim 3:** oop

**maps.syb:** 13 n fine asl

- a. Conversation between LINHART, using maps.syb and Minor Victim 3 on 7/19/2023

**maps.syb:** so that 13yo

**maps.syb:** she's willing to do everything but have me put it in

**maps.syb:** the question is

**maps.syb:** do you think i should just like

**maps.syb:** force it in.

**maps.syb:** she's scared of the pain that's why

**maps.syb:** she has never put a finger in

**maps.syb:** facts but i just want to put it in

**maps.syb:** once i get her rly horny i'll just pressure her into it

**maps.syb:** i bet she's going to be the tightest i've ever had

**maps.syb:** i wonder how fast i'll cum

**maps.syb:** i love my girls sm

**Minor Victim 3:** wym

**maps.syb:** my little girls

**maps.syb:** got 2 13yos & a 12yo ready to lose it

**Minor Victim 3:** yes

**maps.syb:** and a 15yo

**Minor Victim 3:** lose what

**maps.syb:** their cards

**maps.syb:** 2 15yos\*

**maps.syb:** and a 14yo

**Minor Victim 3:** so you got one for almost every year

**maps.syb:** LMAO YEAH

**maps.syb:** JUST NEED TO GO LOWER THAN 12 BUT IT GETS REALLY

RISKY IF YOU GO LOWER

**Minor Victim 3:** yea like really

**maps.syb:** atp just rape

**maps.syb:** i love girls sm bruh

**maps.syb:** im addicted

**maps.syb:** genuinely

**Minor Victim 3:** you need to go to rehab

**maps.syb:** i deserve every girl

**maps.syb:** they all deserve to be stretched out and filled with nut

**maps.syb:** idk if there will be a time when im not attracted to teens.

- b. Conversation between LINHART, using maps.syb and Minor Victim 3 on 7/20/2023

**maps.syb:** TONIGHT IS A BIG NIGHT

**Minor Victim 3:** WHATS MAKING IT BIG

**maps.syb:** IM OMW TO SEE Minor Victim 1

**Minor Victim 3:** WHOS Minor Victim 1

56. **LINHART,** using maps.syb sent Minor Victim 3 four non child pornographic images of Minor Victim 1.

**Minor Victim 3:** SHES 12

**maps.syb:** im bringing her a vape bc her mom took hers

**Minor Victim 3:** why is a 12 year old vaping

**maps.syb:** we smoking too

**Minor Victim 3:** youre going to get a 12 year old high??

**maps.syb:** she said she wanted to

**maps.syb:** SUCCESS

**Minor Victim 3:** LMAOO

**Minor Victim 3:** WAS IT GOOD

**maps.syb:** no sex sadlt

**maps.syb:** i fingered tf outta here

**maps.syb:** ate her kitty

**maps.syb:** n she sucked meeee

**maps.syb:** AT FIRST I COULDNT FIND HER HOLE BC ITS SO SMALL

**maps.syb:** but i found it

**maps.syb:** ended up fitting a max of 4 fingers. which is surprising bc i could barely fit 1 at first

**maps.syb:** HER GRIP IS INSANE TOO

**maps.syb:** N BRO HER HEAD IS THE BEST. HER JERK OFF SKILLS  
THE BEST TOO

**Minor Victim 3:** 4 FINGERS

**maps.syb:** i got her mad comfy n wet asl

**maps.syb:** the kitty stretched

**maps.syb:** i wanted to put it in so bad bro

**maps.syb:** i think 12 is my absolute favorite

**maps.syb:** i wanted to force it in but i could tell she'd be a fighter so i didn't

**Minor Victim 3:** nooooooooooooooo

**Minor Victim 3:** 12 was a very traumatic age

**maps.syb:** her pussy tasted so good

**maps.syb:** her spit smells so good

**maps.syb:** her lips were soft

**maps.syb:** tongue so soft and wet

***LINHART Distributes Visual Depictions of Minor Victim 6 Engaged in Sexually Explicit Conduct to Minor Victim 3 (Count 4)***

57. LINHART, using maps.syb, sends Minor Victim 3 a series of three images and three videos containing Minor Victim 6. Below is a description of one photograph and one video.

58. This image is of Minor Victim 6 only wearing black socks, and is fully nude from the ankles up, exposing her breasts and vagina. Minor Victim 6 is sitting on a hardwood bedroom floor in front of a full-length mirror and holding a light blue cell phone to capture the photographs. The wall behind Minor Victim 6 is also light blue in color. The camera is focused on Minor Victim 6's breasts and vagina, with her face slightly visible.

59. This is a 10-second-long video of a female minor child laying on what appears to be a bed in front of a mirror. The female minor child is not wearing pants and has her legs spread apart exposing her vagina. The female is recording herself in the mirror while masturbating.

60. In reviewing the images and videos, based on my training and experience these images and videos constitute child sex abuse material as defined by Title 18, United States Code, Section 2256.

61. Accordingly, and as set forth above, I believe that on July 20, 2023, **LINHART**, using maps.syb distributed child pornography material to Minor Victim 3.

***LINHART Sexually Exploits Minor Victim 4 (Count 5)***

62. Minor Victim 4 is a 14-year-old minor child from Union Mills, IN, and used the Instagram account SaraXXXXXXXXX (known, but redacted).

63. Between on or about July 18, 2023, and July 22, 2023, **LINHART**, using the Instagram account maps.syb, engaged in messaging and exchanging of images and videos with Minor Victim 4. Below are segments of the conversations that the user maps.syb had with Minor Victim 4 with the dates on which they occurred.

- a. Conversation between LINHART, using maps.syb and Minor Victim 4 on 7/18/2023

**Minor Victim 4:** I wish but I don't have a car and I don't have a license cuz I'm only 15

**Minor Victim 4:** How about you come here

**maps.syb:** ur rly far

**maps.syb:** i will on a full day off but i work at like 4

**maps.syb:** TONS OF SEX

**maps.syb:** i'd cum inside u but i dont wanna raise a kid

- b. Conversation between LINHART, using maps.syb and Minor Victim 4 on 7/22/2023

**maps.syb:** it im yours where are my nudesssss

64. At **LINHART's** request, Minor Victim 4, produced the following images and videos that constitute child pornography as defined by Title 18, United States Code, Section 2256 and distributed them to **LINHART** using Instagram.

<u>File</u>	<u>Description</u>
video-614f29c5-ab8b-4e27-ba34-780a062ca315-1690058366.mp4 (578727237808928)	A 58-second-long video depicting a close up of Minor Victim 4's vagina during which Minor Victim 4 is seen manipulating her vagina.
video-820741e5-9546-4f55-968c-b157beca0265-1690058386.mp4 (2349478858556716)	A 31-second-long video depicting Minor Victim 4 who is facing away from the camera. Minor Victim 4's buttocks and vagina are visible during the video. This video shows Minor Victim 4 with a sex toy inserted into her vagina. Minor Victim 4 moves up and down on the sex toy throughout the duration of the video.
video-73ee220b-ae96-4c78-bf51-ae6a31bf4583-1690058428.mp4 (3418140188501950)	A 44-second-long video depicting Minor Victim 4 facing away from the camera. Minor Victim 4's buttocks and vagina are visible during the video. This video shows Minor Victim 4 with a sex toy inserted into her vagina. Minor Victim 4 moves up and down on the sex toy throughout the duration of the video.
video-17c165e6-1ad2-4bcd-8efa-a19d75f79572-1690058464.mp4 (1716446445443915)	A 59-second video depicting Minor Victim 4 in a bathroom and in a shower on her knees. Minor Victim 4 is naked from the waist down, facing away from the camera with her buttocks and vagina exposed. During the video, Minor Victim 4 inserts a sex toy into her vagina and then moves up and down on it.
video-9a589a88-d12c-42c3-ad1f-936d71a5b7c3-1690058509.mp4 (6489558554465310)	A 60-second-long video depicting Minor Victim 4 in a bathroom and in a shower on her knees. Minor Victim 4 is naked from the waist down, facing away from the camera with her buttocks and vagina exposed. During the video, Minor Victim 4 inserts a

	sex toy into her vagina and then moves up and down on it.
video-9830ba29-fa38-46fe-aec2-fc64c3673532-1690058520.mp4 (299624539112103)	An 8-second video depicting Minor Victim 4 with her legs spread apart and the camera placed in between her legs. Minor Victim 4's vagina is exposed during the duration of the video. During this video, Minor Victim 4 manipulates her vagina with a sex toy.
video-956bdceb-8f52-4cae-8555-3dbbd60ebedb-1690058552.mp4 (240345982165971)	A 34-second video depicting Minor Victim 4 with her legs spread apart and the camera focusing on her vagina. Minor Victim 4's vagina and button are exposed during the duration of the video. During this video, Minor Victim 4 manipulates her vagina with a sex toy.
video-8810cf1-7ebf-4a38-89b3-63f1cc45f4c1-1690058618.mp4 (829868268757408)	A 60-second video depicting Minor Victim 4 appears to be in a shower/bathtub wearing only a sweatshirt, her vagina is fully exposed during this video. Minor Victim 4 is facing the camera, with her face becoming fully visible at times during the video. Minor Victim 4 has a sex toy inserted into her vagina that she moves around on during the duration of the video.
video-cf43bbab-9e00-4d12-a430-9885d3c063ff-1690058636.mp4 (295691326365214)	A 10-second video depicting Minor Victim 4 laying down in a bathtub, fully naked. There is no water in the tub, making her vagina, breast, and face visible throughout the duration of the video. During this video, Minor Victim 4 is seen manipulating her vagina with a sex toy.

65. Based on my training and experience the videos **LINHART** enticed Minor Victim 4 to produce constitute child pornography as defined by Title 18, United States Code, section 2256.

66. After receiving the material, **LINHART** said:

**maps.syb:** I LOVE THAT LAST ONE FR

67. As set forth above, this Agent believes on July 22, 2023, **LINHART**, using maps.syb, enticed Minor Victim 4 to produce and distribute child pornographic material.

***LINHART Sends Pornographic Material to Minor Victim 5***

68. Minor Victim 5 is a 15-year-old minor child from South Bend, IN, and used the Instagram account NatallXXXXX (known, but redacted).

69. Between on or about April 11, 2023, and July 6, 2023, **LINHART**, using the Instagram account maps.syb, engaged in messaging and exchanging of images and videos with Minor Victim 5. Below are segments of the conversations that the user maps.syb had with Minor Victim 5 with the dates on which they occurred.

- a. Conversation between LINHART, using maps.syb and Minor Victim 5 on 4/11/2023

**maps.syb:** do u care about my age? im 21

**Minor Victim 5:** nah it j a number frfr

**maps.syb:** when the last time u got dick

- b. Conversation between LINHART, using maps.syb and Minor Victim 5 on 4/27/2023

**maps.syb:** i mean shi we can show each other our bodies

**Minor Victim 5:** when

**maps.syb:** hmm, maybe now??

70. **LINHART**, using maps.syb, distributed an explicit photograph containing an erect male penis to Minor Victim 5. The male appears to be laying down

in a bed with a camouflaged blanket. The male is wearing blue plaid Hanes boxers, and has his erect penis exposed. The male is holding the penis in his left hand.

71. **LINHART** then messaged Minor Victim 5:

**maps.syb:** when we meet, lemme cum deep inside bae

**maps.syb:** i wanna feel your little pussy twitch and throb ml

**maps.syb:** how old are you sharing

**maps.syb:** again ^

**Minor Victim 5:** 14

**maps.syb:** THAT'S LITERALLY PERFECT?

**maps.syb:** age gaps are hot asf tbh

**maps.syb:** can i use all three of your holes?

**Minor Victim 5:** yesyesyes

**maps.syb:** that's so hot tbh i'd creampie all three holes 100%

- a. Conversation between **LINHART**, using maps.syb and Minor Victim 5 on 7/06/2023

**maps.syb:** i'd send u back home w my cum drippin out ml

AND THE BEST SEX VIDS EVER

**maps.syb:** how old r u again my sweet girl

**Minor Victim 5:** i turned 15 last month

72. Based on the above, I believe that on April 27, 2023, **LINHART** sent Minor Victim 5 pornographic material of himself.

***LINHART Sexually Exploits Minor Victim 6 (Count 6)***

73. Minor Victim 6 is a 14-year-old minor child from Fort Wayne, IN and who used the Instagram account ThazinXXXX (known, but redacted).

74. Between on or about July 18, 2023, and July 19, 2023, **LINHART**, using the Instagram account maps.syb, engaged in messaging and exchanging of images and videos with Minor Victim 6. Below are segments of the conversations that the user maps.syb had with Minor Victim 6 with the dates on which they occurred.

- a. Conversation between LINHART, using maps.syb and Minor Victim 6 on 7/18/2023

**maps.syb:** You

**maps.syb:** are the prettiest

**maps.syb:** 13yo i have ever seen

- b. Conversation between LINHART, using maps.syb and Minor Victim 6 on 7/19/2023

75. On or about July 19, 2023, Minor Victim 6 asked **LINHART**, who was using maps.syb if he wanted to see an image that she took of herself. Minor Victim 6 then sent **LINHART** attachment files, which could not be viewed through the message exchange transcript. The conversation during and proceeding the sending of the image attachments insinuates that they are sexually explicit in nature as follows:

**maps.syb:** OMG

**maps.syb:** I WASNT EXPECTING THAT

**Minor Victim 6:** WDYM

**maps.syb:** YOURE GORGEOUS

YOU'RE BUILT LIKE A GODDESS

im in love oh my lord

**Minor Victim 6:** it kinda shows my pussy

**maps.syb:** CAN U PLEASE

**maps.syb:** DO THAT SAME POSE IN THE CAR

**maps.syb:** HOLD UR LEGS UP LIKE THAT

**maps.syb:** SO I CAN EAT UR KITTY

**maps.syb:** i love how you have nothing on except socks. that's so you

**maps.syb:** I LOVE UR TIDDIES SM

**maps.syb:** BUT UR BODY IS MAJESTIC DUDE. SERIOUSLY

76. Subsequently, at LINHART's request, Minor Victim 6, produced the following images and videos that constitute child pornography as defined by Title 18, United States Code, Section 2256 and distributed them to LINHART using Instagram.

<u>File</u>	<u>Description</u>
Image-802880681562295.jpg (802880681562295)	An image depicting Minor Victim 6 wearing black socks, and is fully nude from the ankles up, exposing her breasts and vagina.
Image-665493625028410.jpg (665493625028410)	An image depicting Minor Victim 6 sitting on a hardwood bedroom floor in front of a full-length mirror and holding a light blue cell phone to capture the photographs. The wall behind Minor Victim 6 is also light blue in color. The camera is focused on Minor Victim 6's breasts and vagina, with her face slightly visible.
video-4cd3fa16-93c6-4898-af0f-d28b0210b9c9-1689872022.mp4	A 10-second video of Minor Victim 6 laying on what appears to be a bed in front of a

(1702561160202116)	mirror. The female is not wearing pants and has her legs spread apart exposing her vagina. The female is recording herself in the mirror while masturbating.
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77. After a review of the material, based on my training and experience, these images and videos constitute child pornography under federal law.

78. As set forth above, this Agent believes **maps.syb** enticed Minor Victim 6 to produce and distribute child pornography.

***Identification of LINHART's as the User of maps.syb***

79. I reviewed the data obtained from the account maps.syb. The user of that account sent several clothed photographs of himself to others. In those photographs, **LINHART**'s face was clear and identifiable.

80. On August 15, 2023, Detective Miller sent a facial image of the user maps.syb that was sent multiple times throughout the separate chat conversations to the Carmel Police Department Intelligence Unit for a facial recognition search. A Carmel Intelligence Analyst responded with information that identified a male by the name of **Bobby Cyprus LINHART** with a date of birth of XX-XX-2001.

81. Detective Miller searched databases available to law enforcement for **Bobby Cyprus LINHART** with the date of birth of 07/17/2001. Detective Miller received information from a search of the Indiana Bureau of Motor Vehicles (BMV) for **Bobby LINHART** with an address of 4542 W. Meadows Ln. New Palestine, IN. The BMV photograph of **Bobby LINHART** matches the images of the user maps.syb. New Palestine, IN is within the jurisdiction of the Southern District of Indiana.

82. On August 13, 2023, Detective Miller conducted surveillance on the address listed for **Bobby LINHART** of 4542 W. Meadows Ln, New Palestine, IN. Detective Miller observed a two-door blue in color Hyundai passenger car parked in the driveway of the residence. The Hyundai was bearing Indiana License Plate 138CQB. A search of law enforcement databases for license plate 138CQB showed the vehicle registered to **Bobby LINHART** at the same address.

83. On or about August 16, 2023, Detective Miller submitted a for a State of Indiana Subpoena to T-Mobile (Sprint) for the subscriber information for phone number 210-683-4344, which was the verified phone number attached to the Instagram account for maps.syb. Authority to subpoena was authorized through the Hamilton County Superior Court by the Honorable Judge J. Richard Campbell, on August 16, 2023. On August 28, 2023, T-Mobile responded showing Elvira Davis with the address 4542 West Meadows Lane, New Palestine, Indiana 46163. Elvira Davis is the mother of **Bobby LINHART**.

84. On or about August 25, 2023, Detective Miller submitted a for a State of Indiana Subpoena to NineStar Connect for subscriber information for Internet Protocol (IP) address 208.70.47.39. This IP Address was used on August 4, 2023, to login to Instagram account maps.syb. Authority to subpoena was authorized through the Hamilton County Superior Court by the Honorable Judge Darren Murphy, on August 29, 2023. On September 11, 2023, Ninestar responded showing the IP address was registered to the Hancock Hope House, Inc. located at 35 E. Pierson, Greenfield, IN 46140. The Hancock Hope House is a Homeless Shelter. **LINHART** references

in multiple chat conversations that he was kicked out of his mom's residence and was homeless living with roommates.

85. A search of employment records shows that **LINHART** works for the restaurant chain Panda Express as of quarter three of 2023. Detective Miller conducted an open web-based search which showed a Panda Express located in Greenfield, Indiana. Detective Miller conducted surveillance on **LINHART** at this location and observed **LINHART** working there. During one of the surveillance details, Detective Miller followed **LINHART** back to 1750 Village Dr. West, Apartment B, Greenfield, IN.

86. On February 2, 2024, I served a DHS Administrative Summons to the Greenfield Utility Department, a response on the same day showed that **LINHART** was the subscriber of record at Greenfield Village Apartments located at 1750 Village Dr West, Apartment B, Greenfield, Indiana 46140.

87. A mobile surveillance camera was placed at the residence, with the camera pointed toward main entrance of **LINHART**'s apartment building. The camera was able to record **LINHART** exiting and entering the residence on March 6, 2024, and exiting on March 7, 2024, including showing **LINHART** leaving on March 6, 24 at 17:50:45 and March 7, 2024, at 09:38:45, and entering on March 6, 2024 at 18:27:04.

88. On March 7, 2023, Detective Miller conducted surveillance at 1750 Village Dr West, Greenfield, IN. At approximately 17:15 UTC, Detective Miller observed **LINHART** arrive at this location, driving a two-door blue Hyundai bearing

Indiana License Plate 138CQB. This vehicle is registered to Bobby **LINHART**. Detective Miller observed **LINHART** exit the vehicle and enter the building marked “1750.” Detective Miller then observed **LINHART** unlock a mailbox with a key that was located in the Foyer of the Apartment building and retrieve mail. Detective Miller then observed **LINHART** walk to the opposite end of the hallway, toward the rear of the building, where he entered an apartment using a key.

**EXECUTION OF SEARCH WARRANTS AND INTERVIEW OF LINHART**

89. On or about March 19, 2024, law enforcement officers executed federal search warrants at **LINHART**’s residence and on his person authorized on March 18, 2024 by the Honorable M. Kendra Klump, Magistrate Judge (Warrant 24-mj-253-MKK and 24-mj-254-MKK).

90. The warrants authorized law enforcement to search the SUBJECT PREMISES and **LINHART**’s person for evidence related to violations of Title 18, United States Code, Section 2251(a) and (e), Sexual Exploitation of a Child and Attempt, Title 18, United States Code, Section 2422(b), Coercion and Enticement of a Minor to Engage in Illegal Sexual Activity, Title 18, United States Code, Section 2252(a)(2), Receipt of Visual Depictions of Minors Engaged in Sexually Explicit Conduct, and Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2), Possession of a Visual Depiction of a Minor Engaging in Sexually Explicit Conduct.

91. During the execution of the warrants, officers made contact with **LINHART**, who was the sole occupant of the SUBJECT PREMISES.

92. Once officers secured the residence, they began their search for electronic devices and other evidence authorized by the warrants. During the search, officers located three devices (a desktop computer, cellular device, and an external hard drive) and seized them for forensic examination, which is ongoing.

93. Agents have begun to triage the external hard drive.

***Possession of a Visual Depiction of a Minor Engaging in Sexually Explicit Conduct (Count 7)***

94. During the examination of the external hard drive, officers discovered numerous images and videos that meet the federal definition of child pornography, including a video file labeled telegram:@cp2334, which is an approximately 14 minute video depicting a minor male child who appears to be under the age of 5 years old who is having sexual intercourse with an adult female.

95. I believe based on my training and experience that this video constitutes a depiction of sexually explicit conduct of a minor child and meets the definition of child pornography as defined by Title 18, United States Code, Section 2256.

96. During the search of the premises, and while officers were searching for evidence authorized in the warrant, they discovered in plain view evidence of additional offenses, namely, Possession with Intent to Distribute Controlled Substances in violation of 21 U.S.C. § 841(a)(1) and Carrying a Firearm During and in Relation to a Drug Trafficking Crime in violation of 18 U.S.C. § 924(c)(1) as follows:

- a. Once the apartment was secured the search for electronic devices began, Det. Schalburg began searching the kitchen and located a cabinet full of suspected narcotics.

b. Additionally, the following items were located in the Kitchen Cabinet:

- i. 40 THC vape pens;
- ii. Packing material;
- iii. Fentanyl drug test kits;
- iv. 6 THC solvent packages;
- v. A blue bag containing 2 yellow tablets with marking R039, 1 blue tablet with markings Y20;
- vi. A blue bag containing 2 tablets shaped like bottle with star marking;
- vii. 2 plastic bags containing tablets shaped like skulls totaling an unofficial weight of 8.2 grams;
- viii. a clear plastic bag containing pressed white tablets with markings “XANAX” unofficial weight of 65 grams;
- ix. a clear plastic bag containing white powder unofficial weight of 10.5 grams (suspected cocaine);
- x. 2 clear plastic bags containing brown powder;
- xi. clear plastic bags containing white powder;
- xii. a plastic vial containing white powder;
- xiii. clear plastic bags containing 40 paper tabs (suspected LSD);
- xiv. laminated diamond paper tabs (25) (suspected LSD);
- xv. an edible (600mg) THC product; and

xvi. 2.5 pressed "XANAX" along with LINHART'S Indiana driver's license; and

c. The following items were located in the Kitchen counter:

i. Multiple plastic bags of plant material unofficial weight of 95 grams;

ii. Functioning white digital scale;

iii. Packaging materials; and

iv. Yellow plastic spoon with residue; and

d. The following items were located in the Kitchen drawer:

i. US currency;

ii. (2) \$100;

iii. (29) \$20;

iv. (6) \$10;

v. (4) \$5, and

vi. (42) \$1; and

e. The following items were located in the Kitchen Fridge:

i. THC wax in glass jar unofficial weight of 1 oz; and

f. The following items were located in the Kitchen/Dining room table:

i. (1) Springfield XD 9mm handgun (serial number BB322720);

ii. (1) holster;

iii. (1) THC vape cartridge; and

iv. (2) \$1; and

g. The following items were located in the Master bedroom:

- i. a glass jar containing THC concentrate;
- ii. 3 THC vape pens;
- iii. 130 grams of marijuana; and
- iv. 4 counterfeit US currency. 3

97. **LINHART** was interviewed on scene. During the interview, and having been read his Miranda rights which he waived orally and in writing, **LINHART** in an audio and video recorded interview admitted to the following, which is merely a summary of the audio and video recorded interview:

- a. **LINHART** admitted that he is the user of Instagram account maps.syb.
- b. **LINHART** consensually provided passwords to his devices, and admitted those devices belonged to him.
- c. With respect to Minor Victim 1, **LINHART** admitted that he had communicated with Minor Victim 1 via Instagram using maps.syb. During those communications, **LINHART** admitted that he had arranged to meet Minor Victim 1 in person to engage in sexually explicit conduct. **LINHART** stated that he met with Minor Victim 1 after work, drove to her residence, parked down the street, and she snuck out of the residence. **LINHART** believed she was 12 years old. **LINHART** admitted that during that meeting, he provided marijuana to Minor Victim 1, and

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3 Other items including electronic devices were also located and seized relevant to the child exploitation investigation as authorized by the 24-mj-253, 254-MKK warrants. Having encountered the above in plain view as they searched for evidence of the subject offenses of those warrants, officers submitted a warrant for their search and seizure to the on duty federal magistrate judge on March 19, 2024.

that they engaged in sexual activity, including but not limited to, digital penetration and oral sex.

d. With respect to Minor Victim 2, **LINHART** admitted that he had communicated with Minor Victim 2 via Instagram using maps.syb. During those communications, **LINHART** admitted that he, knowing that Minor Victim 2 was under the age of 18, enticed her to produce images and videos constituting sexually explicit conduct including but not limited to exhibition of the genitals and masturbation.

e. With respect to Minor Victim 3, **LINHART** admitted that he had communicated with Minor Victim 3 via Instagram using maps.syb. During those communications, **LINHART** admitted that he, knowing that Minor Victim 3 was under the age of 18, enticed her to produce images and videos constituting sexually explicit conduct including but not limited to exhibition of the genitals, and to sharing those images with other minors. **LINHART** admitted to driving to Kentucky to meet with Minor Victim 3, but stated that the meeting ultimately never occurred.

f. With respect to Minor Victim 4, **LINHART** admitted that he had communicated with Minor Victim 4 via Instagram using maps.syb. During those communications, **LINHART** admitted that he, knowing that Minor Victim 4 was under the age of 18, enticed her to produce images and videos constituting sexually explicit conduct, including but not limited to, those similar to what is described in the table above, including masturbation and use of sex toys.

g. With respect to Minor Victim 5, **LINHART** did not remember communicating with Minor Victim 5.

h. With respect to Minor Victim 6, **LINHART** admitted that he had communicated with Minor Victim 6 via Instagram using maps.syb. During those communications, **LINHART** admitted that he, knowing that Minor Victim 6 was under the age of 18, enticed her to produce images and videos constituting sexually explicit conduct including, but not limited to, those described in the table above, including depicting Minor Victim 6 masturbating.

i. **LINHART** stated that he knew that Minor Victim 1-4, and 6 with whom he communicated via Instagram were at or below 15 years old.

98. **LINHART** admitted to possessing 20-25 THC cartridges, ketamine, cocaine, and marijuana, but denied possessing fentanyl. **LINHART** claimed the narcotics were for his personal use.

99. **Interstate or foreign commerce:** The devices used to create and store the images and videos described above were manufactured outside of the State of Indiana or contain parts that were manufactured outside of the State of Indiana, and therefore, travelled in interstate or foreign commerce. Instagram is a facility of interstate commerce.

100. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that **BOBBY CYPRUS LINHART** has violated or attempted to violate the following offenses:

a. **Count 1:** Coercion and Enticement of Minor Victim 1 to Engage in Illegal Sexual Activity, in violation of 18 U.S.C. § 2422(b), between on or about July 17, 2023, and on or about July 20, 2023;

b. **Count 2:** Sexual Exploitation of Minor Victim 2, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 18, 2023 and August 20, 2023;

c. **Count 3:** Sexual Exploitation of Minor Victim 3, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 15, 2023 and July 20, 2023;

d. **Count 4:** Distribution of Visual Depictions of Minor Victim 6 Engaged in Sexually Explicit Conduct to Minor Victim 3, in violation of Title 18, United States Code, Section 2252(a)(2), on or about July 20, 2023;

e. **Count 5:** Sexual Exploitation of Minor Victim 4, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 15, 2023 and on or about July 22, 2023; and

f. **Count 6:** Sexual Exploitation of Minor Victim 6, in violation of Title 18, United States Code, Section 2251(a) and (e), between on or about July 18, 2023 and July 19, 2023; and

g. **Count 7:** Possession of a Visual Depiction of a Minor Engaging in Sexually Explicit Conduct in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2), on or about March 19, 2024.

*/s Trent Tonkovich*  
Trent Tonkovich,  
Special Agent  
Department of Homeland Security

Attested to by the applicant in accordance with the requirements of Federal Rules of Criminal Procedure 4.1 and 41(d)(3) by telephone.

Date: March 20, 2024

